IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

	X	
	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
	Х	

THE CITY OF DETROIT'S REPLY IN SUPPORT OF ITS OBJECTION TO CLAIM NUMBER 852 FILED BY MICHIGAN AUTO RECOVERY SERVICE

The City of Detroit (the "City"), by and through its undersigned counsel, for its reply (the "Reply") to Michigan Auto Recovery Service's ("Michigan Auto") Response dated April 30, 2015¹ (the "Response") [Dkt. No. 9777], and in further support of the City's Fourteenth Omnibus Objection to Certain Books and Records Claims ("Fourteenth Omnibus Objection") [Dkt. No. 9569] regarding claim number 852 (the "Claim"), respectfully states as follows:

BACKGROUND

- 1. On July 18, 2013 (the "Petition Date"), the City filed this bankruptcy case.
- 2. On November 21, 2013, this Court entered its *Order, Pursuant to Sections 105,* 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing Proofs of Claim and Approving Form and Manner of Notice Thereof (the "Bar Date Order") [Dkt. No. 1782].
- 3. On July 9, 2014, this Court entered its Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 3007 Approving Claim Objection Procedures [Dkt. No. 5872] (the "Claims

¹ Michigan Auto's original Response was stricken from the record by this Court for failure to link to the appropriate objection [Dkt. No. 9778]. Therefore, the City files this Reply in an abundance of caution in the event that Michigan Auto files a corrected response in advance of the hearing on this matter.

<u>Procedures Order</u>"), allowing the City to file an omnibus objection with respect to claims that are inconsistent with the City's books and records (Claim Procedures Order at 2).

- 4. On February 7, 2014, Michigan Auto filed the Claim as a general unsecured claim in the amount of \$48,525.00.
- 5. On March 30, 2015, the City filed its Fourteenth Omnibus Objection [Dkt. No. 9569]. As to the claims objected to in the Fourteenth Omnibus Objection, the City determined that the claims included therein were inconsistent with the City's books and records and/or that the City does not have any liability on account of the claims.
- 6. In its Claim, Michigan Auto stated that the basis for the claim was "Services performed." Michigan Auto's Claim No. 852 is attached as Exhibit 1. The documents that Michigan Auto attached to its Claim to allegedly identify the bases for and support its claim for amounts owed are largely unreadable. Moreover, a description of services performed was not included in the supporting documentation.
- 7. The City filed the Fourteenth Omnibus Objection and objected to Michigan Auto's Claim because, according to the City's records, there are no outstanding amounts owed to Michigan Auto. In addition, the City was unable to verify the alleged invoices included with the Claim because they were unreadable. Prior to filing its objection, the City requested readable documents from Michigan Auto numerous times to no avail. As a result, the City moved forward with its books and records objection to the Claim. Based on the City's records, no money is owed to Michigan Auto.
- 8. On or about March 30, 2015, the City served notice of the Fourteenth Omnibus Objection on Michigan Auto [Dkt. No. 9569].

- 9. On April 30, 2015, Michigan Auto filed a Response with this Court claiming that it would provide readable copies of the invoices for review.
- 10. The City agreed to adjourn the hearing on the Fourteenth Omnibus Objection as to Michigan Auto's Claim pending review on the readable invoices.
- 11. In May 2015, Michigan Auto did provide the City with original copies of the invoices attached to the Claim (the "Original Records"). Upon examination, however, these documents do not correspond to any outstanding invoices in the City's books and records. In fact, the invoices are from 1993-2001, which predate the records that were available to the City.
- 12. In any event, based on a review of the Original Records, it is clear that the Claim is barred by the applicable statutes of limitation. Therefore, the Claim should be disallowed and expunged.

ARGUMENT

- 13. Section 502(a) of the Bankruptcy Code provides that a claim is deemed allowed unless a party in interest objects. 11 U.S.C. § 502(a).²
- 14. Section 502(b)(1) provides that claims which are unenforceable against a debtor under applicable law or agreement shall not be allowed.
- 15. Pursuant to Section 101 of the Bankruptcy Code, a creditor holds claim against a debtor only to the extent that it has a "right to payment" for the asserted liability. *See* 11 U.S.C. §§ 101(5), 101(10). There is no right to payment to the extent that the asserted liability is not due and owing by the debtor.
- 16. Upon review of the Original Records, the City's books and records do not show an outstanding amount owed to Michigan Auto. In making that determination, the City reviewed

² Section 502 of the Bankruptcy Code is applicable to this Chapter 9 case through Section 901 of the Bankruptcy Code. *See* 11 U.S.C. § 901.

its Vendor Database, accounts payable records, disbursements records and its lists of active and retired employees. *See* Declaration of John Naglick in Support of Debtor's Fourteenth Omnibus Objection. None of those records showed an outstanding amount owed to Michigan Auto.

- 17. Further, upon obtaining the Original Records, the City confirmed that they are based on services allegedly performed for the City between the years 1993 and 2001.³ This time period is well beyond any statute of limitations that would allow for recovery on the Claim.
- 18. Bankruptcy courts throughout the country have disallowed claims where it is apparent on their face that the statute of limitations expired prior to the bankruptcy pursuant to Section 502(b)(1). See e.g., In re Mazyck, 521 B.R. 726, 731 (Bankr. D.S.C. 2014) (disallowing breach of contract claim based on South Carolina's three year statute of limitations); In re Young, 2013 WL 3992456, *4 (Bankr. E.D. Tenn. Aug. 2, 2013) (disallowing breach of contract claim based on Tennessee's six year statute of limitations); In re Hess, 404 B.R. 747, 751 (Bankr. S.D.N.Y. 2009) (disallowing three breach of contract claims based on New York's six year statute of limitations); In re Dorsey, 2008 WL 2511897, *2 (Bankr. D. Md. June 20, 2008) (disallowing breach of contract claim based on Maryland's three year statute of limitations).
- 19. In fact, one bankruptcy court recently imposed sanctions on two parties who filed proofs of claim for debts which were patently uncollectable based on the applicable statute of limitations. *See In the Matter of Sekema*, 523 B.R. 651 (Bankr. N.D.Ind. 2015). In *Sekema*, two debt collectors filed proofs of claim for debts where the six year statute of limitations had long since passed. *Id.* at 654. The court determined that it "blindingly obvious" that the debtor could raise a statute of limitations defense. *Id.* It further found that the claimants could have determined this solely by looking at the information they themselves provided in the proof of

³ The Claim lists invoices generated in 2001 as being unpaid, and the City believes that is the latest date at which any of the outstanding invoices may have been generated.

claim. *Id.* Therefore, the court held that the claimants violated Fed. R. Bankr. P. 9011 by failing to conduct a reasonable investigation into the claims before filing. *Id.* The court fined each claimant \$1,000.00 for the violation. *Id.* at 655.

- 20. Just as in *Sekema*, it is blindingly obvious in this case that the statute of limitations has passed for any conceivable claim Michigan Auto could raise. Specifically, under MCL 600.5807(8), the statute of limitations on breach of contract claims is six years. Other claims to which Michigan Auto may have looked for recovery, such as unjust enrichment (MCL 600.5813; *see also Trudel v. City of Allen Park*, 2013 WL 6037152, at *17 (Mich. Ct. App. Nov. 14, 2013)), or promissory estoppel (MCL 600.5807(8); *see also Alliance Associates, L.C. v. Alliance Shippers, Inc.*, No. 265101, 2006 WL 1506687, at *4 (Mich. Ct. App. June 1, 2006)), also have six year statutes of limitation and are similarly unavailing. As such, Michigan Auto was required to file suit against the City for the disputed amounts by 2007 at the latest over seven years ago.
- 21. Furthermore, just as in *Sekema*, this information was well known to Michigan Auto and its counsel, because they had the records which showed the amounts owed were from no later than 2001, and included that information in the proof of claim.
- 22. As a result, the statute of limitations for the Claim has expired and the alleged debt is no longer enforceable against the City. Michigan Auto is prohibited from recovering on its Claim pursuant to Section 502(b)(1). Therefore, this Court should disallow and expunge the Claim.

WHEREFORE, the City respectfully requests that this Court enter an order disallowing and expunging the Claim, and granting the City such other and further relief as this Court may deem just and proper.

Dated: July 17, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon
John A. Simon (P61866)
Tamar N. Dolcourt (P73425)
Leah R. Imbrogno (P79384)
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tdolcourt@foley.com
limbrogno@foley.com

Counsel for the City of Detroit, Michigan

EXHIBIT 1: PROOF OF CLAIM NO. 852

4842-7737-3988.3

UNITED STATES BANKRUPTCY	COURT EASTERN DISTRIC	T OF MICHIGAN	PROOF OF CLAIM
Name of Debtor: Michigan City of Detro	oit	Case Number:	
		13-53846	FILED (I)
			2014 FEB -7 P 12: 48
NOTE: Do not use this form to make a claim may file a request for payment	for an administrative expense that arise of an administrative expense according		g. YOU COURT
Name of Creditor (the person or other ent Michigan Auto Recovery Service	•	ey or property):	S. BASKROPTO DETROIT E.D. MICHIGAN-DETROIT COURT USE ONLY
Name and address where notices should % Kurt Thornbladh, Esq.	be sent:		Check this box if this claim amends a
Thornbladh Legal Group PLLC			previously filed claim.
7301 Schaefer Dearborn, MI 48126			Court Claim Number:
T-11	914	. 11	Filed on:
Telephone number: 313 943 2678 Name and address where payment should			
Telephone number:			Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.
1. Amount of Claim as of Date Case Fil	email: ed: \$48,525.00		FEB 1 2 2014
If all or part of the claim is secured, comp	· · · · · · · · · · · · · · · · · · ·		£ FD 1 5 5014
If all or part of the claim is entitled to prio	ority, complete item 5.		KURTZMAN CARSON CONSULTANTS
Check this box if the claim includes i interest or charges.	interest or other charges in additio	n to the principal amou	nt of the claim. Attach a statement that itemizes
2. Basis for Claim: Services perform (See instruction #2)	ed		
3. Last four digits of any number by which creditor identifies debtor:	3a. Debtor may have scheduled		Uniform Claim Identifier (optional):
by which creditor identifies deptor.	Michigan Auto Recovery Serio (See instruction #3a)		ee instruction #3b)
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is setoff, attach required redacted documer		right of time	ount of arrearage and other charges, as of the case was filed, included in secured claim, if any:
Nature of property or right of setoff: Describe:	Real Estate Motor Veh	icle Cother Basi	is for perfection:
Value of Property:		Amo	ount of Secured Claim:
Annual Interest Rate: (when case was filed)	Fixed or Variable		ount Unsecured:
5. Amount of Claim Entitled to Priority the box specifying the priority and sta		part of the claim falls	into one of the following categories, check
Domestic support obligations under	Wages, salaries, or com	missions (un 🗀	Contributions to an
11 U.S.C. §507(a)(1)(A) or (a)(1)(B). Up to \$2,775* of deposits toward purchase, lease, or rental of property	to \$12,475*) earned with before the case was file debtor's business cease	nin 180 days d or the ed, whichever	employee benefit plan - 11 U.S.C. § 507(a)(5). Amount entitled to priority:
or services for personal, family, or household use - 11 U.S.C. §507(a)(7	Taxes or penalties owed governmental units - 11 §507(a)(8).	U.S.C.	Other - Specify applicable paragraph of 11 U.S.C. §507(a)().
* Amounts are subject to adjustment on 4/1/16			
6. Credits: The amount of all payments	s on this claim has been credited f	or the purpose of maki	ing this proof of claim. (See instruction #6)

B10 (Official Form 10) (04/13)

510 (Gillout 10) (G-1/10)		
7. Documents: Attached are redacted copies of any documents that support the claim accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 perfection of a security interest are attached. If the claim is secured by the debtor's prince (See instruction #7, and definition of "redacted".)	aim based on an open-end or revolving const thas been completed, and redacted copies of	umer credit agreement, a statement of documents providing evidence of
DO NOT SEND OBIGINAL BOOLINENTS, ATTACKED BOOLINENTS AND BEST	TOO (TD 45755 CO44) WIG	
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DES	TROYED AFTER SCANNING.	R CREATED A FEE
If the documents are not available, please explain:		
		FEB 1 2 2014
8. Signature: (See instruction #8)		E feet gray
Check the appropriate box.		KURTZMANCARSINICONSIITANTS
☐ I am the creditor. ☐ I am the creditor's authorized agent.	I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.)	I am a guarantor, surety, indorser, or other codebtor (See Bankruptcy Rule 3005.)
I declare under penalty of perjury that the information provided in this claim is true and c	orrect to the best of my knowledge, information	on, and reasonable belief.
Print Name: Kurt Thornbladh Title: Counsel for Creditor Company: Thornbladh Legal Group PLLC Address and telephone number (if different from notice address above): 7301 Schaefer Dearborn, MI 48126	(Signature)	1 2/4/2013 (Date)
Telephone number: 313 943 2678 email:		

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, exceptions to these general rules may apply.

Items to be completed in Proof of Claim form

Court, Name of Debtor, and Case Number:

Fill in the federal judicial district in which the bankruptcy case was filed (for example, Central District of California), the debtor's full name, and the case number. If the creditor received a notice of the case from the bankruptcy court, all this information is at the top of the notice.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care goods or services, limit the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to the claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor: State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

3b. Uniform Claim Identifier:

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

4. Secured Claim:

Check whether the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien

documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507(a).
If any portion of the claims falls into any category shown, check the appropriate box(es) and state the amount entitled to priority. (See Definitions.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement or secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. Do not send original documents, as attachments may be destroyed after scanning.

8. Date and Signature:

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicers as the company. Criminal penalties apply for making a false statement on a proof of claim.

AFFIDAVIT OF ACCOUNT STATED

State of Michigan)
)Ss
County of Wayne)

- Kurt Thornbladh, first being duly sworn, deposes and says as follows: I am the attorney and agent for Creditor and I make this affidavit upon a review of the files and records attached.
- According to the files and records of the Creditor, the Debtor is indebted to it over and above all set-offs in the amounts indicated:

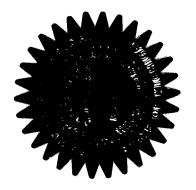
Date of Report	Page No.		Number of Invoice Reported	s	Amount
01/24/01	163		30		\$1,620.00
02/20/01	164		30		\$1,620.00
02/20/01	165		30		\$1,584.00
02/22/01	166		30		\$1,460.00
02/22/01	167		30		\$1,561.00
02/27/01	168		30		\$1,733.00
03/01/01	169		30		\$1,733.00
03/07/01	170		30		\$1,228.00
03/07/01	172		30		\$1,516.00
03/12/01	173		30		\$1,174.00
03/13/01	174		30		\$1,174.00
03/20/01	175		30		\$1,183.00
03/21/01	176		30		\$1,183.00
03/21/01	177		30		\$1,487.00
03/29/01	178		30		\$1,193.00
03/29/01	179		30		\$1,482.00
04/02/01	180		30		\$1,193.00
04/02/01	181		30		\$1,482.00
04/06/01	182		30		\$1,208.00
04/11/01	183		30		\$1,252.00
04/18/01	184		30		\$1,022.00
04/18/01	185		30		\$1,382.00
04/23/01	186		30		\$947.00
04/24/01	187		30		\$1,382.00
05/01/01	188		30		\$1,231.00
05/03/01	189		30		\$950.00
04/14/01	190		30		\$983.00
05/23/01	191		30		\$1,162.00
05/31/01	192		30		\$1,162.00
05/31/01	193		30		\$1,231.00
	1	TOTAL		\$ 48,52	25,00

Further your affiant says not.

Subscribed and sworn to before me on February 7, 2014.
___/s/ hawraa al-aridhi
HAWRAA AL-ARIDHI, NOTARY PUBLIC Wayne County, Michigan
My Commission Expires: May 6, 2014
Acting for Wayne County

__/s/_kurt thornbladh_____ Kurt Thornbladh.

HAWRAA R AL-ARIDHI
Notary Public, State of Michigan
County of Wayne
My Commission Expires 01-18-2019
Acting in the County of Life 10



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Wednesday, January 24, 2001

William William



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MAR	49	9/15/98	23552	P	\$75.00 C
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Wednesday, January 24, 2001

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MAR	23	19/12/98	2004.5	. 15	\$54.00 🔏	С

Toesday, February 29, 2001

VendorCode	Command	Date	InvoiceNo	ServiceType	Amount Re	cordType
MAR	49	10/12/98	23944	C	\$54.00 💢	С
MAR	49	10/6/98	23856	\$	\$34.00	С
MAR	49	10/6/93	23854	, S	\$34.00	С
MAR	49	10/9/98	.23655	S	\$34.00	С
MAR	49	10/6/98	23857	S	\$34.00	С
MAR :	49	9/15/98	20555	p	375.00	O
MAR	;)	U15/88	23054		57 5.00 🔀	C
CAPAC	£.3	:/15/9 8	235 52	P	375.00 💢	C.
MAR	49	9/15/98	23553	P	\$75.00	Ċ
HAR	., s)	3114/93	23519) 	\$75.00 X	C
\$4 8	29	19/4A:5 3	20517	Þ	375.00 📈	С
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	3	· (1)	inati iž		7 113 4	
JLV	~; <u>}</u>	217'00	92564	S	535.00	٧
JLV	18	11/24/99	84525	P	555.00 😾	V

Tuesday, February 20, 2001

NN.1998

VendorCode	Command	Date -	InvoiceNo	ServiceType	Amount RecordType
НЕМ	49	7/11/99	065488	ρ	\$50,00 V
HEM	49	7/10/99	065480	p	\$50.00 V
НЕМ	49	7/10/99	066790	Р	\$50.00 ×
нем	49	7/10/99	066789	Р	\$50.00 ×
HEM	49	7/10/99	066788	þ	\$50.00 X V
HEM	19	· //10/99	9667 87	ρ	350.00 × V
REM	49	7/10/99	006786	ρ	\$50.00 X V
нем	<i>49</i>	7/10/99	0354 82 -	þ	550.00
'EM	1ġ	7/10/99	065479	· ρ	\$50.00 ∀ ∨
inEM	7.d	⇔1 €/09	o554 78	c. _j	∴50.00 \/ ∨
H-전체	49	7/10/99	065448	P	350.00 X V
£34	9	7710799	∂∂ 6785	C }	\$5 0.00 🖟 🗸
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		1 13	1190,903		774.00 📈 - V -
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		17.23	1.60		TELON BY STATE
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97 48	.')	14/9/98	24351	د;	354.00 / G
MAR	49	11/5/98	24354	₽	\$54.00 °C

Thursday, February 22, 2001

NO 1998 Sept.

VendorCode	Command	Date	InvoiceNo	ServiceType	Amount Rec	ordType
MAR	49	11/3/98	24269	P	\$54.00	С
MAR.	49	11/3/98	24263	þ	\$54.00	С
MAR	49	11/2/98	24264	þ	\$54.00	С
MAR	49	11/2/98	24259	ρ	\$54.00	С
MAR	49	11/2/98	24258	p	\$54.00	С
MAR	49	11/2/98	24265	İs	354.00	С
MAR	49	1,1/2/98	24256	ρ	\$54.00	С
MAR	49	1 1/2/98	24257	ρ	354.00 🔨	C
MAR	49	11/1/98	24240	Þ	354.00 X	С
.AR	(32)	11/1/68	24239	ja.	354.00 💢	C
MAR	49	11/1/98	24242	þ	\$54.00 🗶	С
SAR.	.	13/1/98	24241	Þ	354.00 X	C
		$\mathcal{G}_{CM}(\mathbb{N})$. 5004		504.00 X	
5 B	. *}	$i_{ij}(\mathfrak{A}_{ij})^{\prime}$. 0030		:04.00 💢	-3
		712.88	1.3934		1.54.00 🙏	Ö
		1 a 23			54.00 /	No.
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er e 🗸		155,856	60° , 66°		854.00 y (17
		e e time of six	1 24:55		154.00 /	ී
. r . C	~)	F1/112/98	20048	٦	354.00 火	C
1944 ₹	. J	10/4 2/28	23049	<i>د</i> .	354.00 🔏	C
. NIR	, »J	6/12/08	(239)44	<i>(</i> 3	:54.0 0 火	C
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			. h . \$61 ⊌\$	A.	24(0) 2	:
SWR .	:9"	rt/6/9 8	20855	5	334.00	C
MAR	‡)	0/15/98	23554	þ	\$75.00	C

Thursday, February 22, 2001







VendorCode	C	•			
	Command	Date	InvoiceNo	ServiceType	Amount RecordType
HEM	49	7/1/99	065470	Р	\$54.00 X V
НЕМ	49	7/1/99	065469	Р	\$54.00 V
MAR	49	10/13/98	23983	P	\$54.00 X C
MAR	49	10/13/98	23982	Р	\$54.00 × C
MAR	49	10/13/98	23981	Р Р	\$54.00 X C
MAR	49	10/13/98	23979	Р	\$54.00 × C
MAR	49	10/13/98	23980	P P	\$54.00 🔨 C
MAR	49	10/13/98	239 58	P	\$54.00 √ C
MAR	49	10/13/98	23984	Р	\$54.00 🔨 C
MAR	49	10/12/98	23946	P	\$54.00 💉 C
MAR	49	10/12/98	23949	Р	\$54.00 × C
MAR	49	10/12/98	23945	Р	\$54.00 × C
MAR	49	10/12/98	23944	p	\$54.00 C
MAR	19	10/12/98	23948	$\mathbf{c}_{i_{j_1}}$	\$54.00 C
MAR	‡9	10/12/98	23947	ь	\$54.00 C
MAR	t 9	10/6/98	23857	S	334.00 C
MAR	19	10/6/98	23856	S	. 334.00 ° C
FIAR .	19	10/6/98	23354	s	334.00 C
MAR	49	10/6/98	23855	S	\$34.00 C
MAR	49	9/15/98	2355 3	P	\$75.00 C
MAR	19	9/15/98	23 552	, p	375.00 C
MAR	49	9/15/98	23554	P	\$75.00 C
MAR	49	9/15/98	23555	P	\$75.00 × €
MAR	49	9/14/98	23519	P	\$75.00 × C
MAR	49	8/19/98	23162	P	\$75,00° kg V
MAR	49	3/19/98	23163	P	\$75.00 △ ∨
MAR	19	8/19/98	23160	1,3	\$75.00 >> V
MAR	.49	3/19/9 8	23161	t ₁	\$75.00 V
MAR	49	6/19/9 8	22374	р	\$56.00 K
MAR	49	6/19/98	22375	P	\$56.00 X C

Tuesday, February 27, 2001

Entered 07/17/15 16:17:67\ Pa

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13-53846-tjt Doc 10062 Filed 07/17/15

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June 1998

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VendorCode -	1. Command	Date	InvoiceNo	ServiceType	Amount RecordType
HEM	19	7/1/99	065470	Р	\$54.00 V
HEM	49	7/1/99	085469	io.	354.00 × V
MAR	49	10/13/98	23983	2	\$54.00 × C
ЫAR	49	10/13/98	23982	$\mathbf{c}_{\mathbf{i}}$	\$54.00 × C
MAR	49	10/13/98	23981	Р	\$54.00 × C
JAR	49	10/10/98	23979	p	\$54.00 × C
DAR.	49	:0/13/9 8	23 930	\mathfrak{p}	≋54.00 💢 C
D/AR	- \$ FG	16/13/98	239 58	. · · · · · · · · · · · · · · · · · · ·	554.00 X C
TAR	99	1977-2798	23534	P	154.00° /K 0
[e48. 2]	+.1	. 51978	KJ246	r ^a	-54.00 X C
· 1953	. (9)	10/12/98	.1394 9	P	554.00 ⋌ c
i./9/3	ş.j	./2/12/98	1004)	; a	554.00 💢 C
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Patrioday, March 01, 2001

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Y VendorCode	Command	Date	InvoiceNo	Service Type	Amount RecordType
GHT	49	1/26/01	24253	þ	\$50.00 C
GHT	49	1/26/01	2385 0	P	\$50.00 📈 C
GHT	49	1/26/01	24251	Р	\$50.00 X C
GHT	49	1/26/01	24252	P	\$50.00 × C
GHT	49	1/7/01	23849	р	\$50.00 X C
GHT	49	1/7/01	23848	p	\$50,00 × C
CAPIT	49	1/7/01	23845	þ	350.00 X C
GHT	49	1/7/01	23847	P	350.00 A C
SHT	49	1/7/01	23 846	Р	\$50.00 🔀 C
7 T		1/1/01	23 243	્ર	550.00 🔨 C
GHT	49	1/1/01	23244	o ·	859.90 × C
tu s	. ?9	7/1/01	23 842	Þ	350.00 🗶 🕠 C
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	173	7/24/3 9	205495	9	334.00 🗶 Ú
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		5.5			and K. W.
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:198	49	2/10/01	39008	P	\$34.00 🔀 C

Wednesday, March 07, 2001

VendorCode	Соттана	Date	InvoiceNo	ServiceType	Amount 1	RecordType
MAR	49	2/10/61	39007	P	\$34.00	(c
MAR	49	2/10/01	39906	Ö	\$34.00 🔀	
MAR	49	2/10/01	39010	8	\$34.00 🔀	C
MAR	49	2/10/01	39009	p	\$34.00	ζ ο
MAR	49	2/10/01	3900 5	P .	\$34.00	K c
- MAR	39	3/19/98	23160	د	§75.00)	₹ ∨
TAI R		√ 13/9 8	.83163	e p	875.00 <i>4</i>	< v
MAR	48)	∴/19/98	23162	Ł,	₃75.00 🏏	* V
7AR	[9]	3/19/98	23161	⊙ ·	\$75.00	(v
(7)	* }	77.CCO	<i>cy</i> 055 ,	ذ	328.00	< v
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H.V	14	10/30/99	81275	ζ;	375.00×	٧

Wednesday, March 07, 2001

07/17/15 15:17:57 Page 21/of 44

My X X49

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pg. 172

VendorCode	Command	Date	InvoiceNo	ServiceTyp e	Amount RecordType
HEM	49	11/24/00	017878	р	\$30.00 📈 C
HEM	19	11/24/00	017882	Р	\$30.00 X C
HEM	49	11/24/00	071878	þ	\$30.00 × V
HEM	49	11/24/00	071882	ρ	\$30.00 × V
нем	49	7/21/99	065495	P	\$34.00 × V
HEM	43	7/21/99	065494	p	s34.00 X V
HEM	,J	7/21/99	005496	j. P	834.00 🔀 V
. : લાખે	49	7/20/99	მი56 79	P	\$34.00 🎉 V
HEM	49	7/20/99	0656 80	Į a	\$34.00 🗙 V
MEM .	ું ક	//20/99	035681	į s	504.00 × V
CLAR	.9	¥10/01	.⊚00 5	p	§34.00 🗶 C
1.00		./10/01	/O07	, ۲	734.00 📈 C
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t _e 7		9/18 /99	75721	ှ	⊴3.00 X V
VJE	18	. 0/17/9 9	75718	S	\$35.00 × V

Monday, March 12, 2001

Mitgot #49

VendorCode	Command	Date	InvoiceNo	ServiceType	Amount RecordType
HEM	49	11/24/00	017878	Р	\$30.00 X C
HEM	49	11/24/00	017882	Ŕ	€30.00 × C
HEM	49	11/24/00	071878	P	\$30.00 V
HEM	49	11/24/00	071882	Р	\$30.00 X V
HEM	49	7/21/99	065495	P	\$34.00 🖟 🗸
HEM	19	7/21/09	065494	Ь	534.00 × V
URM	i)	7/21/99	06549 6	P	\$34.00 K V
	19	7/20/99	065679	c _i	\$34.00 K V
REM	19	//20/99	065680	р	\$34.00 × V
CEW	C.,	710/99	065681	· p	534,00 🖟 V
8/14 R	49	2/10/ 01	39005	Р	534.00 C
SAR	· · ·	17/10/01	50 007	် မှ	\$34,00 C
	<i>3</i>	1.7704	63		04.00 A, G
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		1.0701	^1 (X9	**************************************	24.60 K 0
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		1000			2000 X V
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JLV	ાં	W12/9 9	73721	ج, ،	328.00 💢 ∨
4i.A	18	3/17/99	75718	S	\$35.00 V

Tnesday, March 13, 2001

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\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Command	Date	InvoiceNo	ServiceType	Amount RecordType
HEM	49	11/24/00	017878	р	\$30.00 C
HEM	49	11/24/00	017882	Р	\$30.00 × C
HEM	49	11/24/00	071878	Р	\$30.00 ×
HEM	49	11/24/00	071882	Р	\$30.00
HEM	49	7/21/99	065495	b	\$34.00 × V
HEM	49	7/21/99	065494	Р	\$34.00 × V
HEM	₫ ₩	7/21/99	065496	Ь	\$34.00 🔀 V
HEM	49	7/20/99	065679	Р	\$34.00 × V
HEM	4.9	7/20/99	065680	P	334.00 V
MEH	29)	7/20/99	065681	þ	\$34.00 × V
MAR	:9	2/10/01	39005	, Ci	334.00 × C
MAR	÷ 9	2/10/01	39007	ci	534.00 × C
· 11 \$.)	710/01	.1508	**************************************	T04.60 1 0
ाधर		740a01	E 176 5	Þ	(34.00 , 🔀 - 6)
.44k	÷.,	/16,01	. [0.79	.3	84.60 💉 - C
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. s. ix	,	.715853	25.51		.75.60 ∕ ∨ V
. 33	i. J	a carea	55 logi		√5.50 × ∨
.1.8	. 3	713.58	13480		.75.00 📈 V
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7.31 2	~3)	11/19/99	22017	3	30.00
. 121	30)	11/19/99	2017	197	00.00 V
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Ney .	(2)	718/99	75721	ļ	32 3.00 🔀 V
BLV	43	8/17/99	75718	S	\$35.00 💢 V

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Vendor Code	Command	Date	InvoiceNo	G	μ.
GHT	49	1/7/01	23846	ServiceType	Amount Record
GHT	49	1/1/01	23842	Р	\$50.00, C
	49	1/1/01	23844	P	350.00 C
GHT	49	1/1/01	23843	P	350.00 C
GHT	49	12/5/00		р	550.00 × c
GHT	.49	11/28/00	23818	þ	\$0.00 y
GHT	49	10/10/00	23612	Ċ	\$54.00 × C
GHT	49		22433	þ	\$56.00 × C
OHT -	$^{\circ}\mathbf{g}^{\circ}$	8/26/00	20376	Р)50.00 × c
Clare	7.3	3/26/00	20377	Ċ	∷30.00 ⊃< c
199M	19	3/17/99	203790	ò	530.00 / C
'EM	÷ 9	11/24/00	017878	P	330.00 - C
MEM	1 m² 5 w¶ 1 ∰	11/24/00	917982	্ত	S
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Sub Total: 1183.00

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Aug. 1998

Pg. 176

VendorCode	Command	Date			
GHT	19		InvoiceNo	ServiceType	Amount RecordType
GHT	19	1/7/01	2 3846	Р	350.00 C
GHT	‡ 9 .	1/1/01	23844	р .	\$50.00 ∕ C
GHT		1/1/01	23843	p	350.00 C
GHT -	49	1/1/01	23 842	Р	550.00 K C
OHT *	49	12/5/00	23818.	p	30.00 V
ChT	39	11/28/00	23812	P	154.00 X C
ाना समा	49	10/10/00	22433	Ç	355.00 × G
	;9	3/26/00	୧ ୦ 377	p	550.00 . C
CHT	√9	3/2 6/00	20376	ø	750.00 🖟 👵
114T	43)	°/17/9 9	20 37 9p	· p	
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		′ ′ (/		
VendorCode	Commana		InvoiceNo	ServiceType	
MAR -	49	3/19/98	23160		Amount RecordType
MAR	19	8/10/98	23161	þ	\$75.00 X
TRI	49	7/26/00		P	\$75.00 V
TRI	49	11/19/99	20355	P	\$28.00 X
TRI	49		22017	S	\$0.00 C
Bt.∨		11/19/99	2017	S	\$0.00 ∨
ЗLV		10/11/00	116337	X	375.00 × y
- DEV	-i 3 .	4/21/00	098145	S	935.00 X V
SLV	48	4/17/00	098130	; e	555.00 × V
ntv	48	2/17/00	92504	S	335,00 × y
BLV	3	1 W2 H99	94525	, ,	≎55.00 💢 y
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EXE	14	1/31/01	171854	s ·	045.60 V
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Wednesday, March 21, 2001

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Jul-2001

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VendorCode	Command	Date	InvoiceNo	ServiceType	Amount RecordType
GHT	49	1/26/01	24252	P	\$50.00 / C
GHT	49	1/7/01	23849	Р	\$50.00 C
GHT	49	1/7/01	23847	b	\$50.00 × C
SHT	49	1/7/01	23845	Р	\$50.00 × C
GHĭ	49	1/7/01	23846	cļ	350.00 × C
HT	19	1/7/0 1	228 48		950.00 × C
ाभा	<u>i</u> e)	1/1/01	23343	₍₂).	050.00 🖟 C
SHT	39	1/1/01	23844	9	750.00 🖟 C
ីកី រី	÷9	1/1/ 01	23842	cj	₹50.00 × C
THIT	÷9	12/5/00	23818	p	30.00 V
Jif .		11/00/00		.5	754.90 K (C
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23/4	<i>-</i> 9	7/00/0 9	030679	: 2	334.00 🖟 V
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JAR	49	⊠10/01	ამ 007	ρ	\$34.00 💢 C
MAR	49	2/10/01	39006	ь	334.00 C

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Vandaa Cala	•	, Ñ			
VendorCode	Command	Date	InvoiceNo	ServiceTyp e	Amount RecordType
MAR	49	3/19/98	2316 1	P	\$75.00 V
MAR	49	8/19/98	23 162	P	\$75.00 V
MAR	49	8/19/98	23160	P	\$75.00 ×
MAR	49	8/19/98	23163	P	\$75.00 × V
TRI	49	7/26/00	20355	Р	\$28.00 V
fRI .	49	11/19/99	22017	3	\$0.00 C
33	49	11/19/99	2917	. 8	\$0.00 V
(3LV	48	10/11/00	116337	×	375.00 × V
BLV	4 8	4/21/00	098145	s	\$35.00 × y
.∺LV	13	#1 7/00	098100	p	○55.00 × V
βUV	48	3/20/00	95337	×	355.00 × V
ELV .	18 -3	S/1 3/00	94494	×	35 5.00 🖟 V
1.52		1.115.0	j dwg5	* * * * * * * * * * * * * * * * * * * *	35.00 √< V
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HLV		1/23/01	123550	; ;3	335.60
OLV	44	1/15/01	124225	X	\$35.00 / V
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VendorCode	Command	Date	InvoiceNo	ServiceType	Amount RecordType
GHT	49	1/26/01	24251	p	\$50.00 C
GHT	49	1/7/01	23846	р	350.00 C
GHT	49	1/7/01	23849	þ	\$50.00 C
GHT	49	1/7/01	23847	p	\$50.00 C
GHT	49	1/7/01	23845	Р	\$50.00 C
GHT	49	1/7/01	23848	c }	\$50.00 × C
SHT	e:	1/1/01	23842	P	950.00 × C
онт	49	1/1/01	23844	ł5	550.00 📈 C
GHT	49	1/1/01	23843	þ	650.00 ⋌ ° C
HT	\$D	12/0/00	£318	\mathbf{c}_{4}	00.0 0 7 .
SHT	:45)	11/28/00	23812	Ь	354.00 × C
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MAR	4 · · · · · · · · · · · · · · · · · · ·	470/01	25.337	P	534.00 20° 0
MAR	49	2/10/01	39008	P	\$34,00 🔑 C

Monday, April 02, 2001

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,		vale	InvoiceNo	ServiceType `	Amount RecordType
MAR	49	8/19/98	23162	P ,	\$75.00 V
MAR	49	8/19/98	23161	P	\$75.00 X
MAR	49	3/19/98	23163	Ď	\$75.00 × V
MAR	- 49	8/19/98	23160	þ	\$75.00 🗶 V
TRI	19	7/26/00	20355	p	\$28.00 × V
TRI	49	11/19/99	22017	ŝ	\$0.00 G
TISI	Q^{\prime}	11/10/99	2017		36.00 V
.mA	133	en (de dista	115337	st.	∍75.60 j≪(= V
NLV	19	4/21/00	093145	-5	335.00 V
111	473	. 1/17/00	398130	eta	nsmood y
BLV	43	3/20/00	95337	×.	: \$55.00 ➤ V
MN	+1)	0.10/00	21195		55.00 💢 V
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Tonday, April 02, 2001

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^ VendorCode	Command /	Date	() InvoiceNo	ServiceType	Amount RecordType
HEM	49	7/21/99	065496	p :	\$34.00 V
HEM	49	7/20/93	065681	Р	\$34.00 × V
HEM	49	7/20/99	065679	P	\$34.00 × V
HEM	49	7/20/99	065680	P	\$34.00 × V
MAR	49	2/10/01	39005	P	\$34.00 × C
MAR	49	2/10/01	39010	p	\$34.00 × C
HAR HAR	49	2/10/01	39007	þ	\$34.00 × C
MAR	49	2/10/01	39 008	.' ρ.	\$34.00 × C
MAR	49	2/10/01	39009	þ	\$34.00 × C
MAR	.;9	2/10/01	39006	ρ	334.00 × C
MAR	49	8/19/98	23161	· p	375.00 × V
MAR	.19	8/19/98	23163	ن	₹75.00 × ∨
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M.V	13	0/17/00	92504	\$ 	10.00 × V
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Friday, April 06, 2001

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A C	(A	InvoiceNo	ServiceType	Amount RecordType
VendorCode	Command		065679	Р	\$34.00 V
HEM	49	7/20/99	39007	P	\$34.00 C
MAR	49	2/10/01		Р	\$34.00 C
MAR	49	2/10/01	39009	P	\$34.00 C
MAR	49	2/10/01	39008	Р	\$34.00 C
MAR	49	2/10/01	39010	P	\$34.00 × C
MAR	49	2/10/01	39006	, Ρ	534.00 🖟 C
MAR	49	2/10/01	39 005	ا ب	\$75.00 V
MAR	13	e/19/9 8	23160		375.00 K
MAR	49	8/19/98	23163	p m	375.00 X
J.IAR	491	3/19/98	23162	P	575.00 ×
MAR	19	3/19/98	2 31 61	i s	528.00 × V
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Wednesday, April 11, 2001

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	Command	Date	InvoiceNo	ServiceType	Amount 1	RecordType
EXE	49	3/23/00	163627	p	\$0.00	C
EXE	49	37.23/00	163626	Р	\$28.00 📉	C
EXE	49	3/9 / 9 0	163185	Р	\$0.00	С
EXE	49	3/9/00	153184	· P	\$0.00	(C)
EXE	49	3/9/0 0	163183	Р	\$0.00	Č
EXE	49	3/9/00	163186	Р	\$0.00	С
GHT	49	1/28/01	23850	ခ	\$ 50.00	´ €
ЗНТ	49	1/26/01	24251	ρ	\$50.00 ×	(v
GaT	· 49	(/16/01	24174	Х		< v
⊗a T	\$3 ·	1/10/01	20894	K	370.00 🚉	₹ V
CHT	49	11/28/00	23812	P	354.00	€ 6
GHT	ú ∌	J26/00	20377	دع	33 0 .00 - 1	C C
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SAR	49	ਤ/1 9/98	23163	p	\$75.00	/ v. /

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VendorCode	Command	Date	InvoiceNo	ServiceType	Amount RecordType
MAR	49	3/19/98	23160	Р	\$75.00 × V
MAR	49	8/19/98	23161	P :	\$75.00 V
MAR	49	8/19/98	23162	P	\$75.00 💢 V
TRI	49	7/26/00	20355	Р	\$28.00 V
TRI	49	11/19/99	22017	s S	\$0.00 C
TRI	49	11/19/99	2017	s ·	\$0.00 V
3LV	48	10/11/00	1153 37	Χ	575.00 ×
BLV	48	3/20/00	9 5337	X	§55.00 ✓ ∨
3LV	48	3/13/00	94495	X	\$55.00 ×
HLV .	43	3/13/00	94494	Х	355.00 × V
BLV	4 8	2/17/00	92504	S	30.0 0 V
BLV	48	8/18/ 99	75721	þ	50.00 V
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3LV	44	10/29/00	116400	ρ	835.00 💢 − V
BLV	44	10/2/00	110894	P	\$55.00 😾 V

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Entered 07/07/15/15:17

New 49

LI.7001



VendorCode	Command	Date	InvoiceNo	ServiceType	Amount Record	Туре
EXE	49	3/23/00	163627	р	- \$0.00 C	
EXE	49	3/23/00	163626	р	528.00 💢 C	
EXE	49	3/9/00	163185	р	\$0. 00 C	
EXE	49	3/9/00	163184	þ	\$0.00 C	
EXE	49	3/9/00	163183	ρ	\$0.00 C	
EXE	49	3/9/00	163186	Р	\$0.00 C	
UHT .	49	1/26/01	23850		\$50.00 ^X C	
CHT	13	1/26/01	24251	ρ	\$50.00 📉 V	
CHŢ	48	1.16/01	24174	Х	591.00 × V	
GHT	(3)	1/13/01	23694	X	\$70.00 🔀 ° ∨	
GHT	49	11/28/00	23812	ę	354.00 🦯C	
Shr	10	0./26/00	29377	p	\$50.00 ⊃≺ C	
***	:)	(a) Repair	1.673		50.00 J N 0	
:11		717/39	3.375 p	·	- 100.00-x1 C	
		: 1/2/3/0 ()	7202		000.00 kg - Q	
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::EM	49 ·	7/20/99	0 65680	្ត្	334.00 × V	
MEM Comment	s.ĝ	.730/99	00 081	v^{Σ}	934.00 🔏 🔍	
FM	::•)	3/10/01	3007	Ę	334.00 🖋 💢 💍	
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MAR	49	2/10/01	J9010	Ţ?	\$34.00 📈 O	

Monday, April 23, 2001

Mit 49

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VendorCode	Command	Date	InvoiceNo	ServiceType	Amount RecordType
MAR	49	8/19/98	23160	Р	\$75.00 × V
MAR	49	8/19/98	23161	Р	\$75.00 V
MAR	49	8/19/98	23162	Р	\$75.00 × V
TRI	49	7/26/00	20355	Р	> \$28.00 V
TRI	49	11/19/99	22017	S	\$0.00 C
TRI	49	11/19/99	2017	S	\$0.00 V
BLV	48	10/11/00	116337	X	→ \$75.00 V
BLV	48	3/20/00	9 5337	X	_ \$55.00 × V
BLV	48	3/13/00	94495	X	- \$55.00 ✓ V
BLV	48	3/13/00	94494	Χ	\$55.00 × V
BLV	48	2/17/00	92504	S	\$0.00 V
BLV	48	8/18/99	75721	Р	\$0.0 0 V
BLV	48	8/17/99	75718	S	\$0.00 V
BLV .	48	8/16/99	74668	X	\$145.00 🔯 V
BLV	48	4/26/99	632 57	S	\$35.00° < V
BLV	18	2/16/99	5 7253	X	~ \$75.00 °< V
3LV	18	11/15/95	438 53	\$	\$35.00 V
BNG	48	3/8/01	3 072	ρ.	\$28.00 V
EXE	48	3/16/01	173451	X	\$75.00 · V
EXE	48	1/7/99	148329	X	\$0.00 V
3LV	44	2/27/01	131261	×	- \$55.00 V
BLV	44	2/7/01	126 238	Χ	≥ \$55.00 📉 V
BLV	44	2/5/01	125344	S	\$36.00 N ∨
BLV	44	1/30/01	125328	×	→ \$55.00 × V
BLV	44	1/23/01	125127	Р	≈ \$50.00 × V
BLV	14	1/23/01	125550	p ·	2 \$35.00 · → V
BLV	14	1/15/01	124225	Υ,	- 335.00
BLV	14	1/1/01	126701	S	335.00 × V
BLV	44	10/29/00	116400	þ	→ \$35.00 × V
BLV	44	10/2/00	110894	Р	- \$55.00 × V

Tuesday, April 24, 2001

Subject \$ 382.00 Entered 07/17/15 15:17:57 Page 37 of 44



VendorCode	Command	Date	InvoiceNo	ServiceType	Amount R	ecordType
HEM	49	1/4/00	161314	Р	\$0.00	V
HEM	49	7/21/99	065494	P .	\$34.00 \	V
HEM	49	7/21/99	065495	P	\$34.00 \	V
HEM	49	7/21/99	065496	P	\$34.00	V
HEM	49	7/20/99	065679	Р	\$34.00	V
НЕМ	49	7/20/99	065680	P · ·	\$34.00	V
HEM	49	7/20/99	065681	P	\$34.00 🔀	V
MAR	49	2/10/01	39010	P.	\$34.00	С
MAR	49	2/10/01	39008	P	\$34.00	С
MAR	49	2/10/01	39009	Р	\$34.00	С
MAR	49	2/10/01	39005	P	\$34.00	С
MAR	49	2/10/01	39006	P	\$34.00	С
MAR	49	2/10/01	39007	Р	\$34.00 💉	С
MAR	49	8/19/98	23160	Р	\$75.00	٧
MAR	49	8/19/98	23163	P	\$75.00	V
MAR	49	8/19/98	23162	P	\$75.00	٧
MAR	49	8/19/98	23161	P	\$75.00	V
TRI	49	7/26/00	20355	P	\$28.00	V
ſĸı	49	11/19/99	22017	s	\$0.00	С
TRI	49	11/19/99	2017	S	\$0.00	V
BLV	48	10/11/00	116337	X	\$75.00	٧
BLV	48	3/20/00	95337	X	\$55.00 <	V
BLV	48	3/13/00	94495	х	355.00	V
BLV	48	3/13/00	94494	· X	\$55.00	V
BLV	48	2/17/00	02504	Ś	\$0.00	Λ
Bt_V	48	ਰੋ/18/99	75721	ρ	\$0.00	V
BLV	18	3/17/99	75718	3	30,00	V
BLV	18	8/16/99	74668	Х	\$145.00	V
BLV	18	4/26/99	83257	Ŝ.	\$35.00	٧
BLV	48	2/16/99	57253	X	\$75.00	V

Tuesday, May 01, 2001

Subject 1 331. cc

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Meit 49

Ariel 2001

Pg. 189

VendorCode	Command	Date	InvoiceNo	ServiceType	Amount RecordType
GHT	49	11/28/00	23812	Р	\$54.00 × C
GHT .	49	8/26/00	20377	р	\$50.00 C
GHT	49	8/26/00	20376	p .	\$50.00 C
GHT	49	3/17/99	20379p	P	\$0.00 _\ C
HEM	49	11/24/00	071862	P .	\$36.00 C
188M	49	11/24/00	017882	Р	530.00 × C
n#M	;9	1/4/00	161314	· _i a	30.0 0 V
New Mark	ŧĠ	7/21/99	065494	ł.,	534.00 📈 V
HEM	49	7/21/99	065496	Р	\$34.00 × V
. 1M	Ġ	1723/99	055495	. د	334.00 × V
n€M	. 49 °	7/20/99	085679	φ, ,	§34.00 ✓ V
- 11M	(\hat{J}_{-})	7/10/99	065680	· ·	334.00 🚉 . V
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SLV	48	3/1 7/99	75718	S	\$0.00 V

Marif 49

April 2001

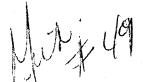
Pg. 190

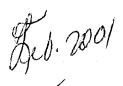
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Vendor Code	Command	Date	InvoiceNo	ServiceType	Amount RecordType		
HEM	49	11/24/00	071862	Р	\$36.00 \(C		
HEM	49	11/24/00	017882	Р	\$30.00 X C		
HEM	49	1/4/00	161314	Р	\$0.00 V		
HEM	49	7/21/99	065494	р	\$34.00 × V		
HEM	49	7/21/99	065496	P	\$34.00 × V		
HEM	49	7/21/99	065495	Р	\$34.00 × V		
HEM	49]	7/20/99	065679	ρ	\$34.00 × V		
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mEM	+9	7/20/99	.065 681	p	\$34.00 🖋 ∨		
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Monday, May 14, 2001

Sub Total: 483.

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VendorCode	Command	Date	InvoiceNo	ServiceType	Amount Re	
GHT ,	49	2/24/01	25168	P	\$38.00 🗡	A
GHT	49	2/24/01	2516 7	p .	\$38.00	v
GHT	49	2/24/01	25165	. Р	\$38.00 🔏	V
GHT	49	2/24/01	25166	Р	\$38.00 🔏	٧
GHT	49	2/13/01	25159	þ	\$54.00	٧
ShT	49	2/13/01	25158	e '.	\$54.00 peon.	٧
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GHT	49	2/6/01	24270	Р	542.00 A	٧
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MAR	49	2/10/01	J9 008	, * P	334.00 🗡	Co

Friday, May 25, 2001

Leb. 2001

VendorCode	Command	Date	InvoiceNo	ServiceType .	Amount Rec	cordType
GHT	49	2/24/01	25165	Р	\$38.00	V
GHT	49	2/24/01	25166	Р	338.00	٧
CHT	. 49	2/24/01	25167	ρ	338.00×	٧
GHT	49	2/24/01	2516 8	P	\$38.00	٧
GHT	49	2/13/01	25157	р .	\$54.00 🗸	٧
CHT	49	2/13/01	25158	þ	\$54.00 	٧
: State	44)	2/13/01	25159	۲	554.00 × °	٧
Shif	c)	::/13/01	25160	ρ	\$54.00 ⁷	٧
SHT	$_{i}\Theta$	2/6/01	22848	þ	\$42.00	٧
AHT.	49	73/01	00847	, a	⇒2.9 0 Å	٧
CHT	t 9	2/6/01	22846	þ	342.00 ×	У
ii e î	19}	.56/01	22345	د	342.00 √ [*]	A
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HEM	<u>(j)</u>	7/23/99	::65680	þ	834.00 ×	V
MAR	49	2/10/ 01	39006	ķ	\$34.00	C

Thursday, May 31, 2091

VendorCode .	Command .	Date **	InvoiceNo-	Service Type	Amount RecordType
HEM	49 👌 🔾	1/4/00	.181314	· Park	\$0.00, V
HEM	49	7/21/99	065494	P. S.	334 00 X V
НЕМ	4 <u>9</u>	7/21/99	095495		334.00 × V
HEM	49	7/21/99	065496	P	- \$34.00 ∠ ↓ V
HEM	49	7/20/99	Q65679	þ	\$34.00× V
HEM	49	7/20/99	7 065680	Р	, s34.00 × , ∨
HEM	49	7/20/99	085681		\$34.do X V
	32° ·	2/10/01	01005		\$34,60 ∕ €
MAR	49	2/10/01	089 03	P	334.00 × 20
WAR	49	2/10/01	3908 9	. .	334.00 🗶
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MAR	(3)	⊒10/04, <u>﴿</u>	_ă 0300 6	P.	334. 90 🖟 🖰
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5/31/01

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2015, I caused the *City of Detroit's Reply in Support of Its Objection to Claim Number 852 Filed By Michigan Auto Recovery Service* to be electronically filed with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF participants in this bankruptcy case. I hereby certify that a copy was also served via Federal Express to the following party:

Michigan Auto Recovery Service c/o Kurt Thornbladh, Esq. Thornbladh Legal Group PLLC 7301 Schaefer Dearborn, MI 48126

Dated: July 17, 2015

FOLEY & LARDNER LLP

By: /s/ John A. Simon
John A. Simon (P61866)
Tamar N. Dolcourt (P73425)
Leah R. Imbrogno (P79384)
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Counsel for the Debtor, City of Detroit, Michigan